

REMARKS

Claims 1-10 and 25-32 were pending at the time of the Office Action. Claims 5-7 and 10, 24 and 31 are to a non-elected species, and were not examined. All claims were rejected. Reconsideration of the application is requested in view of the amendments above and the following remarks.

It is requested that, if the next action is not a Notice of Allowance, e.g., is an Advisory Action, that the Examiner call the undersigned at 408 451-5906 so that we may discuss the application.

1. **Objections to the Drawings re: Hatching**

The drawings were objected to because the metal terminals 24 “do not show a cross-hatching.” Amendments to the drawings to include such cross-hatching are submitted herewith via a separate paper. Accordingly, it is submitted that this objection is overcome.

2. **Objection to the Drawings and Rejection under 35 USC § 112 re: Checkerboard**

The drawings were objected to on grounds that the “checkerboard pattern” of certain of the claims is not shown. Similarly, claims 1-4 and 8-9 were rejected under 35 USC § 112, ¶ 1 on grounds that “the specification is silent regarding ‘checkerboard pattern’ claim 1, line 3.” It is submitted, however, that both the objection to the drawings and the rejection of the claims are erroneous.

The “checkerboard pattern” of claim 1 is at least shown in Figures 3, 10, and 12. Moreover, the specification refers to the “checkerboard pattern” and the drawings in several places, as indicated by the following quotations.

Fig. 3 is a plan view of a portion of lower side 22 of body 16 of integrated circuit package 10 of Fig. 1. Fig. 3 shows a checkerboard arrangement of posts 18 on lower side 22. (Page 7, lines 15-17.)

Posts 18 on upper and lower sides 20 and 22 of package 90 of Fig. 9 and Fig. 10 have the same diameter. Posts 18 on upper side 20 of body 16 of package 90 are arranged in a complementary checkerboard pattern to the checkerboard pattern of posts 18 on lower side 22 of body 16. In other words, each post 18 on lower side 22 of body 16 is centrally aligned with a respective space 92 between posts 18 on upper side 20. (Page 19, lines 11-14.)

The arrangement of posts 18 on lower side 22 of body 16 of package 90 [Fig. 10] is similar to the checkerboard arrangement of posts 18 on lower side 22 of body 16 of package 10, as shown in Fig. 3. (Page 19, lines 21-23.)

Fig. 12 is a plan view of a portion of stack 110 of Fig. 11 through the line 12-12. Fig. 12 shows the interlocking spatial relationship (i.e., interlocking checkerboard patterns) between posts 18 (hashed) on lower side 22 of the top package 90 and posts 18 (clear) on upper side 20 of the bottom package 90. (Page 20, lines 5-8.)

In each of these quotations, there is an express reference both to the “checkerboard pattern” and to a figure or structure that exemplifies the “checkerboard pattern.” In the face of these examples, it is clear that the Examiner is in error. Accordingly, the objection to the drawings, and the rejection of the claims under 35 USC § 112, ¶ 1, are erroneous, and must be withdrawn.

3. Rejections under 35 USC § 102

Claims 1-4, 8, 25-30, and 32 are rejected under 35 USC § 102(b) as being anticipated by Goldfarb (U.S. Patent 4,654,472). These rejections are wrong for the same reasons that were asserted in the response to the Office Action of November 6, 2002.

Regarding claim 1, Goldfarb does not show the “checkerboard pattern” of claim 1. This argument was made in the previous response, but it is clear that the Examiner did not appreciate the argument made, since the Examiner wrongly believed that the “specification was silent” regarding the “checkerboard pattern” of the claims. With the quotations above and the discussion below, however, it should be apparent that the rejection under 35 USC § 102(b) also is erroneous.

The term “checkerboard pattern” may be understood by checking a dictionary and by referring to the above-listed quotations from the specification and the associated drawings. A checkerboard is well known to have “squares in alternating colors,” as set forth the Merriam-Webster OnLine Dictionary (www.m-w.com). See Exhibit B hereto. Moreover, the term “checkerboard pattern” is properly and ordinarily used to describe “something that has a pattern or arrangement like a checkerboard.” (Exhibit B).

It is stated in the specification that the posts 18 of Figs. 3, 10, and 12 are in a “checkerboard” pattern. The posts 18 of these examples, while not square, are in a pattern like a checkerboard, in that the posts 18 alternate with the spaces 92 (Fig. 10, and p. 19, line 15) between the posts. That is, the posts 18 and spaces 92 alternate like the different color squares on a checkerboard. Hence, the term “checkerboard pattern” is appropriate, clear in meaning, and clearly supported by the specification.

Perhaps a better way to visualize the “checkerboard pattern” is to view the example of Fig. 12, which is a cross-section taken through the interlocked posts 18 of two stacked packages 90. See, page 20, line 5 *et seq.* The posts 18 of one package 90 fit snugly into the spaces 92 of the other package 90, thereby interlocking and electrically coupling the packages.

In view of the above discussion, it is clear that the rejection of claim 1 as anticipated by Goldfarb is erroneous. Goldfarb lacks the “checkerboard pattern” of claim 1. Goldfarb’s posts (called “forms” 35, 45, 48, 51) are in rows, but do not have the alternating pattern of same-size posts and spaces that is required by the term “checkerboard pattern,” as defined by the dictionary and elaborated in the figures and specification of this application.

Accordingly, the rejection of claim 1 as anticipated must be withdrawn. Claims 2-4 and 8 are dependent on claim 1, and are allowable at least for their dependency on claim 1.

Regarding claim 25, the feature of claim 27 of a “checkerboard pattern” has been incorporated into claim 25. It is submitted that claim 25 is now allowable for the same reasons as claim 1, as set forth above.

Claim 28 is dependent on claim 25 and is allowable for the same reasons.

Claims 29-32 are cancelled.

4. Rejection under 35 USC § 103

Claim 9 was rejected under 35 USC § 103(a) as unpatentable over Goldfarb in view of Barreto (U.S. Patent 5,220,489). However, claim 9 depends from claim 1 and is therefore allowable for at least the reasons given with respect to claim 1.

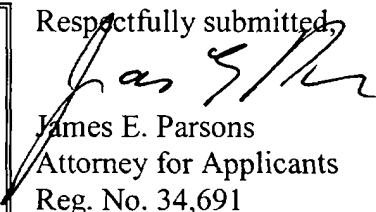
CONCLUSION

The claims are submitted to be allowable. Please direct any questions or comments to the undersigned at 408 451 5906. Papers may be sent by facsimile to 408 451 5908.

EXPRESS MAIL LABEL NO.

EV 338 033 094 US

Respectfully submitted,


James E. Parsons
Attorney for Applicants
Reg. No. 34,691

Customer no. 022888